

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC C. PEARCE	:	CIVIL ACTION NO.:
	:	1:05-cv-11694
Plaintiff,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
KEITH BAUMM,	:	
ADVANCED COMPOSITE	:	
ENGINEERING D/B/A	:	
AEGIS BICYCLES,	:	
WYMAN-GORDON INVESTMENT	:	
CASTINGS, INC.,	:	
STURM, RUGER & CO., INC, AND	:	
UNI-CAST, INC.	:	
Defendants,	:	July 14, 2008

MOTION FOR ENLARGEMENT

Pursuant to Federal Rules of Civil Procedure 6(b), the undersigned plaintiff hereby moves for an enlargement of time of thirty (30) days within which to file their expert disclosures pursuant the Court's previously issued scheduling order. The undersigned further requests that, to avoid prejudice to the other parties to this action, that the remaining scheduling deadlines as set by the Court be also enlarged by thirty (30) days. An affidavit of good cause is attached hereto in support of this motion.

Respectfully submitted:
THE PLAINTIFF,
Eric C. Pearce,
By his attorneys,
Ouellette, Deganis & Gallagher, LLC


Frank C. Bartlett, Jr.
143 Main Street
Cheshire, CT 06410
(203) 272-1157
fbartlett@odglaw.com

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC C. PEARCE	:	CIVIL ACTION NO.:
	:	1:05-cv-11694
Plaintiff,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
KEITH BAUMM,	:	
ADVANCED COMPOSITE	:	
ENGINEERING D/B/A	:	
AEGIS BICYCLES,	:	
WYMAN-GORDON INVESTMENT	:	
CASTINGS, INC.,	:	
STURM, RUGER & CO., INC, AND	:	
UNI-CAST, INC.	:	
Defendants,	:	July 14, 2008

AFFIDAVIT OF GOOD CAUSE

I, Frank C. Bartlett, Jr., having been duly sworn, depose and say and hereby attest to the following facts:

- 1: I believe in the obligation of an oath;
- 2: I am of legal age, over 18;
3. On December 10, 2007, the Court approved the Scheduling Order in the above captioned matter, requiring plaintiff's disclosure of expert witnesses by July 15, 2008.
4. The parties are currently awaiting the transcripts of the depositions of two Aegis employees, John Desjardins and Dean Duplessis.
5. The plaintiff's experts require the transcripts of these depositions in order to properly formulate their opinions in this matter.
6. I have attempted to contact all counsel in this matter regarding their consent to the granting of this motion. Counsel for Keith Baumm and Sturm, Ruger & Co., Inc. consent to the granting of this motion. Counsel for Uni-Cast, Inc. and Wyman-

Gordon Investment Castings, Inc. could not be reached at the time of the filing of this motion.

Dated at Cheshire, Connecticut, this 14th day of July, 2008.

Signed: 

Name: Frank C. Bartlett, Jr.

The foregoing Affidavit was acknowledged before me this 14th day of July, 2008.

State of Connecticut

County of New Haven

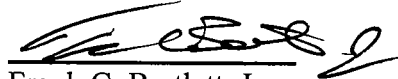

Notary Public/~~Commissioner of~~
~~Superior Court~~

PATRICIA MALIS
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, ~~2009~~ 2013

CERTIFICATION

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 14, 2008.. I further certify that pursuant to local rule 7.1(a) I have attempted to contact all counsel in this matter regarding their consent to the granting of this motion. Counsel for Keith Baumm and Sturm, Ruger & Co., Inc. consent to the granting of this motion. Counsel for Uni-Cast, Inc. and Wyman-Gordon Investment Castings, Inc. could not be reached at the time of the filing of this motion..

By:



Frank C. Bartlett, Jr.
143 Main Street
Cheshire, CT 06410
(203) 272-1157
fbartlett@odglaw.com